

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

BITMANAGEMENT SOFTWARE GMBH,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 16-840 C

Senior Judge Edward J. Damich

JOINT REVISED MOTION TO SCHEDULE SUMMARY JUDGMENT BRIEFING

1. Plaintiff Bitmanagement Software GmbH (“Bitmanagement”) and Defendant the United States of America (the “Government”), respectfully submit this joint revised motion requesting that the Court approve the Parties’ proposed schedule for summary judgment briefing set forth below.
2. The current scheduling order regarding summary judgment, entered on November 13, 2017 (Dkt. No. 20), provides that motions for summary judgment be filed 60 days after the close of fact discovery. On January 19, 2018, the Court in part denied the Parties’ joint motion regarding summary judgment briefing because “[t]he Court is not in favor of simultaneous briefing.” (Dkt. No. 22). Accordingly, the Parties inform the Court that Plaintiff, but not Defendant, intends to move for summary judgment and propose the following briefing schedule:

<u>Event</u>	<u>Proposed Deadline</u>
Plaintiff’s Motion for Summary Judgment	March 2, 2018
Defendant’s Response to Plaintiff’s Motion for Summary Judgment	April 13, 2018

Plaintiff's Reply Brief in Support of Summary Judgment	May 4, 2018
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3. The Parties believe the proposed schedule will provide sufficient time to complete expert discovery and any summary judgment briefing. Accordingly, the Parties respectfully request that the Court enter an order setting forth the Parties' proposed schedule.

Dated: January 24, 2018

Respectfully Submitted,

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Respectfully submitted,

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**electronically signed with permission.*